



"Jennifer Peers"
<JPeers@stratusconsulting.com>

02/17/2009 09:35 AM

To Christopher Cora/R10/USEPA/US@EPA
cc <AudieHuber@ctuir.com>, <cunninghame@gorge.net>, "David Allen" <DAllen@stratusconsulting.com>, "David Chapman" <DChapman@stratusconsulting.com>, <erin.madden@gmail.com>, "JD Williams" <jdw@jdw-law.net>, <JWeis@hk-law.com>, <Lisa.Bluelake@grandronde.org>, <michael.karnosh@grandronde.org>, <ryan@davissudbury.com>, <tomd@ctsi.nsn.us>

bcc

Subject RE: Harbor Oil, Phase 2 sampling responses

Hi Chris - In this email are comments to the Voluntary Group's responses on behalf of the five tribes.

1) The VG proposed collecting subsurface sediments in two sections, 1 to 3 feet and 3 to 5 feet (if feasible), and only analyzing the deeper section if the 1 to 3 foot section has higher concentrations than the original surface sample. This seems a bit nitpicky given the number of samples in question (3). I would prefer to see the deeper sections analyzed in the interest of time and not having to argue about whether to analyze them later. If EPA agrees to delay analysis of the deeper samples, I think that the criteria should be modified as follows: Unless concentrations of all analytes in the 1 to 3 foot section are lower than in the original surface sample, the 3 to 5 foot section will be analyzed. This would provide a better delineation of contamination.

2) The VG has not agreed to collect fish tissue data in this response, and appears to be proposing a population survey instead. A population survey would be helpful, however, I still feel that fish tissue analysis would greatly benefit the reliability of the HHRA and the ERA. This could be done simultaneously with the population survey.

Thank you for the opportunity to comment,
Jennifer Peers

-----Original Message-----

From: Cora.Christopher@epamail.epa.gov
[mailto:Cora.Christopher@epamail.epa.gov]
Sent: Friday, February 06, 2009 11:50 AM
To: KENT.Mavis@deq.state.or.us; rose@yakama.com; erin.madden@gmail.com; sheila@ridolfi.com; David.G.Farrer@state.or.us; Jennifer Peers; Mike_Szumski@fws.gov; Michael.Karnosh@grandronde.org; cunningham@gorge.net; Ted_Buerger@fws.gov; (b) (6)
Neeley.Doug@epamail.epa.gov; (b) (6)
Cc: lgilbert@parametrix.com
Subject: Harbor Oil, Phase 2 sampling responses

All,

Attached are the Voluntary Groups responses to concerns EPA provided on the proposed phase 2 sampling for Harbor Oil. These were received yesterday and EPA is reviewing them concurrently with you. I would like to respond back by February 20th.. Please let me know whether you plan on reviewing this material and if you can do it within this timeframe. In general they are agreeing to address the concerns raised (additional wetland soil sampling, subsurface sediment sampling, fish survey and tissue analysis, shallow groundwater analysis, on-site soil analysis),



with some conditions. The most apparent condition appears to be the fish consumption scenario. Considering the situation (Force Lake is a very limited resource for supplying marketable fish for humans), their condition appears reasonable for this Site.

(See attached file: EPA Recommendations for Phase 2 Sampling_VGResponses 020209.pdf)

Christopher Cora,
Project Manager
U.S. Environmental Protection Agency
Region 10
1200 6th Ave, Suite 900, ECL-115
Seattle, WA 98101-3140
(206) 553-1478
Fax: (206) 553-0124/0957